

Kelly R. Kichline, State Bar No. 10642
Lynne McChrystal, State Bar No. 14739

JACKSON LEWIS P.C.

Bank of America Plaza
300 S. Fourth Street, Suite 900

Las Vegas, Nevada 89101

Tel: (702) 921-2460

Fax: (702) 921-2461

kelly.kichline@jacksonlewis.com

lynne.mcchrystal@jacksonlewis.com

Attorneys for Defendant

CARSON TAHOE REGIONAL MEDICAL
CENTER

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DANIELLE MOORE,

Plaintiff,

vs.

CARSON TAHOE REGIONAL MEDICAL
CENTER AND DOES I-X,

Defendant.

Case No. 3:19-cv-00291-LRH-CBC

ORDER GRANTING
DEFENDANT'S REQUEST FOR
EXCEPTION FROM ATTENDANCE
AT EARLY NEUTRAL EVALUATION
SESSION

Defendant Carson Tahoe Regional Healthcare, which does business as Carson Tahoe Regional Medical Center ("Defendant" or "Carson Tahoe") by and through its counsel of record, Jackson Lewis, P.C., respectfully requests an exception to the early neutral evaluation ("ENE") attendance requirements. Specifically, Defendant requests that Defendant's insurance carrier be excused from in-person attendance at the ENE. The carrier representative will be available by telephone. The undersigned counsel conferred with Plaintiff's counsel who indicated that Plaintiff does not object to this request.

Defendant seeks this exception because, although Chubb insures Defendant, Defendant has a retention of \$100,000 and Defendant will fund the entirety of any resolution reached at the ENE. In addition, the representative for Chubb is located in Los Angeles and would incur significant time and expense to travel to the ENE when any settlement would be well within Defendant's retention. The insurance representative's absence will not adversely affect the ENE,

1 and those present will have the appropriate settlement authority to reach a reasonable resolution at
2 the ENE.

3 Thus, Defendant respectfully requests an exception to the ENE in-person attendance
4 requirements for its carrier, Chubb.

5 Dated this 17th day of July, 2019.

7 JACKSON LEWIS P.C.

8 /s/ Kelly R. Kichline

9 Kelly R. Kichline, State Bar No. 10642
10 Lynne McChrystal, State Bar No. 14739
300 S. Fourth St., Ste. 900
Las Vegas, Nevada 89101

11 *Attorneys for Defendant*
12 *CARSON TAHOE REGIONAL MEDICAL*
CENTER

14 IT IS SO ORDERED.

15 DATED: July 18, 2019.

17 William G. Cobb
18 UNITED STATES MAGISTRATE JUDGE